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CLERK OF DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY: DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

07 CR 3353 JM

UNITED STATES OF AMERICA,) Criminal Case No. _____
Plaintiff,)
v.)
JOSE HEREDIA-GUZMAN (1),) Title 18, U.S.C., 371 -
JUAN CARLOS VASQUEZ-MENDOZA (2),) Conspiracy; Title 8, U.S.C.,
RAMON GALLARDO-SAMANO (3),) Sec. 1324(a)(2)(B)(ii) -
Defendants.) Conspiracy to Bring in Illegal
Aliens for Financial Gain;
Title 8, U.S.C.,
Sec. 1324(a)(2)(B)(ii) -
Bringing in Illegal Aliens for
Financial Gain; Title 18, U.S.C.,
Sec. 2 - Aiding and Abetting;
Title 8, U.S.C.,
Secs. 1324(a)(1)(A)(ii) and
(v)(II) - Transportation of
Illegal Aliens and Aiding and
Abetting

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including November 13, 2007, within the Southern District of California, and elsewhere, defendants JOSE HEREDIA-GUZMAN, JUAN CARLOS VASQUEZ-MENDOZA and RAMON GALLARDO-SAMANO, did knowingly and intentionally conspire together and with each other and with other persons unknown to the grand jury, to bring illegal aliens into the

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1 United States for the purpose of commercial advantage and private
2 financial gain; in violation of Title 8, United States Code,
3 Section 1324(a)(2)(B)(ii).

4 OVERT ACTS

5 In furtherance of said conspiracy and to effect and accomplish
6 the objects thereof, the following overt acts, among others, were
7 committed within the Southern District of California, and elsewhere:

- 8 1. On or about November 13, 2007, near Calexico, California,
9 defendant RAMON GALLARDO-SAMANO drove a green Ford Crown
10 Victoria as a scout vehicle as defendant JUAN CARLOS
11 VASQUEZ-MENDOZA guided aliens unlawfully in the United
12 States, including material witnesses Martin Sanchez-Campos,
13 Juan Ramon Yupit-Chac and Nicanora Moreno-Koh, from the
14 Republic of Mexico into the United States.
- 15 2. On or about November 13, 2007, near Calexico, California,
16 defendant JUAN CARLOS VASQUEZ-MENDOZA loaded eight aliens
17 unlawfully in the United States, including material
18 witnesses Martin Sanchez-Campos, Juan Ramon Yupit-Chac and
19 Nicanora Moreno-Koh, into a white Ford Aerostar van driven
20 by defendant JOSE HEREDIA-GUZMAN.
- 21 3. On or about November 13, 2007, near Calexico, California,
22 defendant JOSE HEREDIA-GUZMAN drove the white Ford Aerostar
23 van containing eight aliens unlawfully in the United
24 States, including defendant JUAN CARLOS VASQUEZ-MENDOZA and
25 material witnesses Martin Sanchez-Campos, Juan Ramon Yupit-
26 Chac and Nicanora Moreno-Koh, and failed to yield to United
27 States Border Patrol Agents when the agents turned on their
28 emergency light and siren.

1 4. On or about November 13, 2007, near Calexico, California,
2 defendant RAMON GALLARDO-SAMANO used a cell phone in the
3 green Ford Crown Victoria to call defendant JOSE HEREDIA-
4 GUZMAN while defendant JOSE HEREDIA-GUZMAN was looking for
5 and loading defendant RAMON GALLARDO-SAMANO and the eight
6 aliens unlawfully in the United States, including material
7 witnesses Martin Sanchez-Campos, Juan Ramon Yupit-Chac and
8 Nicanora Moreno-Koh.

9 All in violation of Title 18, United States Code, Section 371.

10 Count 2

11 On or about November 13, 2007, within the Southern District of
12 California, defendants JOSE HEREDIA-GUZMAN, JUAN CARLOS VASQUEZ-
13 MENDOZA and RAMON GALLARDO-SAMANO, with the intent to violate the
14 immigration laws of the United States, knowing and in reckless
15 disregard of the fact that an alien, namely, Martin Sanchez-Campos,
16 had not received prior official authorization to come to, enter and
17 reside in the United States, did bring to the United States said alien
18 for the purpose of commercial advantage and private financial gain;
19 in violation of Title 8, United States Code,
20 Section 1324(a)(2)(B)(ii), and Title 18, United States Code,
21 Section 2.

22 Count 3

23 On or about November 13, 2007, within the Southern District of
24 California, defendants JOSE HEREDIA-GUZMAN, JUAN CARLOS VASQUEZ-
25 MENDOZA and RAMON GALLARDO-SAMANO, with the intent to violate the
26 immigration laws of the United States, knowing and in reckless
27 disregard of the fact that an alien, namely, Martin Sanchez-Campos,
28 had come to, entered and remained in the United States in violation

1 of law, did transport and move said alien within the United States in
2 furtherance of such violation of law; in violation of Title 8, United
3 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

4 Count 4

5 On or about November 13, 2007, within the Southern District of
6 California, defendants JOSE HEREDIA-GUZMAN, JUAN CARLOS VASQUEZ-
7 MENDOZA and RAMON GALLARDO-SAMANO, with the intent to violate the
8 immigration laws of the United States, knowing and in reckless
9 disregard of the fact that an alien, namely, Juan Ramon Yupit-Chac,
10 had not received prior official authorization to come to, enter and
11 reside in the United States, did bring to the United States said alien
12 for the purpose of commercial advantage and private financial gain;
13 in violation of Title 8, United States Code,
14 Section 1324(a)(2)(B)(ii), and Title 18, United States Code,
15 Section 2.

16 Count 5

17 On or about November 13, 2007, within the Southern District of
18 California, defendants JOSE HEREDIA-GUZMAN, JUAN CARLOS VASQUEZ-
19 MENDOZA and RAMON GALLARDO-SAMANO, with the intent to violate the
20 immigration laws of the United States, knowing and in reckless
21 disregard of the fact that an alien, namely, Juan Ramon Yupit-Chac,
22 had come to, entered and remained in the United States in violation
23 of law, did transport and move said alien within the United States in
24 furtherance of such violation of law; in violation of Title 8, United
25 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

26 Count 6

27 On or about November 13, 2007, within the Southern District of
28 California, defendants JOSE HEREDIA-GUZMAN, JUAN CARLOS VASQUEZ-

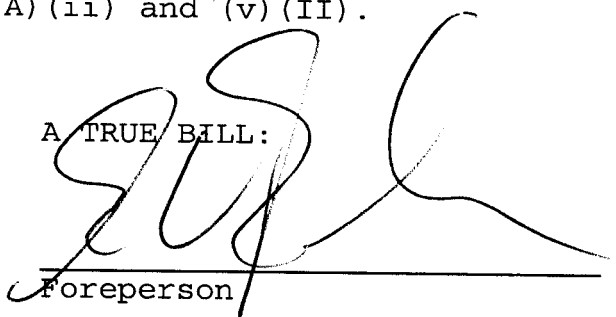
1 MENDOZA and RAMON GALLARDO-SAMANO, with the intent to violate the
2 immigration laws of the United States, knowing and in reckless
3 disregard of the fact that an alien, namely, Nicanora Moreno-Koh, had
4 not received prior official authorization to come to, enter and reside
5 in the United States, did bring to the United States said alien for
6 the purpose of commercial advantage and private financial gain; in
7 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
8 and Title 18, United States Code, Section 2.

9 Count 7

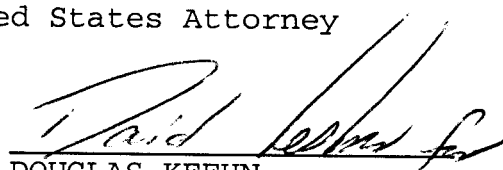
10 On or about November 13, 2007, within the Southern District of
11 California, defendants JOSE HEREDIA-GUZMAN, JUAN CARLOS VASQUEZ-
12 MENDOZA and RAMON GALLARDO-SAMANO, with the intent to violate the
13 immigration laws of the United States, knowing and in reckless
14 disregard of the fact that an alien, namely, Nicanora Moreno-Koh, had
15 come to, entered and remained in the United States in violation of
16 law, did transport and move said alien within the United States in
17 furtherance of such violation of law; in violation of Title 8, United
18 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

19 DATED: December 12, 2007.

20 A TRUE BILL:

21 
22 Foreperson

23 KAREN P. HEWITT
24 United States Attorney

25 
26 By: DOUGLAS KEEHN
27 Assistant U.S. Attorney
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